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"McReynolds, obert"

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<Bob.McReynolds@orst.edu>
cc:
Subject: Docket ID Number OPP-2003-2008

04/07/2003 01:41 PM

Dear Comment Reviewer,

I was recently notified that a request has been submitted to extend the tolerance of Vinclozolin for beans for two years. For the past 3 years, I have been receiving funding from the USDA/IR-4 Project and the local Willamette Valley based, Oregon Processed Vegetable Commission to evaluate fungicides to replace vinclozolin once the registration is canceled in November 2003.

On behalf of the bean growers in the Willamette Valley, I would recommend that EPA grant the extension of time for the following reasons:

Three years of field trial data is not adequate to verify that either of the replacement fungicides we have identified as potential replacements will provide control as efficaciously as vinclozolin. It is a fact, based upon our research that neither product has demonstrated efficacy as good as vinclozolin in these trials. In addition, the weather during the three years of trials has not been conducive to the growth and development, and hence infection and infestation of *Sclerotinia sclerotiorum* (White Rot fungus). In other words we have not been able to establish the performance of either replacement fungicide (fluazinam or BAS 510) under conditions of high disease pressure.

There has not been time to evaluate the effectiveness of BAS510, the one product most likely to be registered for use in 2003, in large scale trials in diverse micro growing climates, prior to it being used by the growers on thousands of acres of beans. All the trials completed in our area (2/year) were small replicated plots (50x100 feet) with more than 6 different fungicides treatments. In my opinion, it is very risky to leap to assumptions of efficacy without large scale or field size application trials over a period of years in which the harvested product is evaluated in processing facilities by their standards in comparison to vinclozolin. If either of these replacement products does not perform as good as demonstrated in our trials the crop loss could have disastrous consequences to a currently financially precarious agricultural industry.

Again, if BAS510 is registered without the extension for vinclozolin the bean industry will be depending on only one product for the control of the White Rot. There is the potential for disease resistance with only

one control product. Failure of that product (BAS510) in any of the next couple of years, without alternate proven chemistries for resistance management would be a catastrophe.

Sincerely,
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